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6 *Dental Group P.C. and Interdent Service*
Corporation

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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 RACHELL A. JACOBSON f/k/a RACHELL
11 A. RHEIN, individually,

12 Plaintiff,

13 vs.

14 PETERSON DENTAL GROUP, P.C., f/d/b/a
CRESSMAN DENTAL GROUP P.C., a
15 domestic professional corporation;
INTERDENT SERVICE CORPORATION, a
16 foreign corporation; DOES I-X; and ROE
BUSINESS ENTITIES I-X, inclusive,

17 Defendants.
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Case No. 2:25-cv-01098-CDS-MDC

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
DEFENDANTS TO RESPOND TO
PLAINTIFF'S COMPLAINT**

(FIRST REQUEST)

19 IT IS HEREBY STIPULATED by and between Plaintiff Rachell A. Jacobson f/k/a
20 Rachell A. Rhein ("Plaintiff"), by and through her counsel, Maier Gutierrez & Associates, and
21 Defendants Peterson Dental Group, P.C., f/d/b/a Cressman Dental Group P.C. and Interdent
22 Service Corporation ("Defendants"), by and through their counsel, the law firm of Jackson Lewis
23 P.C., that Defendants shall have a 2-week extension up to and including **July 31, 2025**, in which
24 to file their response to Plaintiff's Complaint. This Stipulation is submitted and based upon the
25 following:

26 1. Defendants Peterson Dental Group, P.C., f/d/b/a Cressman Dental Group P.C. and
27 Interdent Service Corporation were served with the Summons and Complaint on June 25, 2025,
28 (ECF No. 1) making Defendants' response to Plaintiff's Complaint currently due on July 17,

2025.

2. Defendants' counsel was recently retained and is still in the process of investigating Plaintiff's allegations which include significant monetary damages, including, punitive damages.

3. Moreover, Undersigned Defense Counsel is the Office Managing Principal and responsible for covering the workloads of two attorneys who are out of the office through end of next week, and one attorney who is on leave until mid-August. Thus, undersigned counsel is juggling deadlines in many cases and needs additional time to prepare responses.

4. The Parties have agreed to extend the deadline for Defendants to file their response(s) to Plaintiff's Complaint to July 31, 2025, to allow Defendants sufficient time to address the allegations within the Complaint.

5. This is the first stipulation to extend the time for Defendant to respond to Plaintiff's Complaint.

6. The Parties believe these circumstances constitute good cause for granting an extension. *See* Fed. R. Civ. P. 6(b)(1).

7. This Stipulation is made in good faith and not for the purpose of delay.

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1 8. Nothing in this Stipulation and Order shall operate to waive, relinquish, or impair
2 any claim, defense, objection, or right of any party in this case. Further, nothing in this Stipulation
3 and Order shall be construed as an admission of or consent to the merit or validity of any claim,
4 defense, objection, or right by any party in this case.

5 Dated this 15th day of July, 2025.

6 MAIER GUTIERREZ & ASSOCIATES

JACKSON LEWIS P.C.

7 /s/ Danielle J. Barraza

/s/ Deverie J. Christensen

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Rachell A. Rhein

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Peterson Dental Group, P.C., f/d/b/a Cressman
Dental Group P.C. and Interdent Service
Corporation

12 **ORDER**

13 IT IS SO ORDERED.

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16 Hon. Maximiliano D. Couvillier III
United States Magistrate Judge
Dated: 7/22/2025
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